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9 Attorneys for Plaintiff
UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 MAKSIM ZAITSEV,

16 Defendant.

No. 2:25-cr-00154-SPG

CASE-SPECIFIC GLOSSARY

Trial Date: 5/20/2025

Location: Courtroom of the
Hon. Sherilyn Peace
Garnett

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19 Plaintiff United States of America, by and through its counsel
20 of record, the United States Attorney for the Central District of
21 California and Assistant United States Attorneys Rahul R.A. Hari
22 and Neil P. Thakor, hereby submits a case-specific glossary.¹
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27 ¹ The government received defendant's input for this filing and
28 has included terms proposed by defendant in the case-specific
glossary.

1 Dated: April 30, 2025

Respectfully submitted,

2 BILAL A. ESSAYLI
United States Attorney

3 LINDSEY GREER DOTSON
4 Assistant United States Attorney
5 Chief, Criminal Division

6 /s/
7 RAHUL R.A. HARI
8 NEIL P. THAKOR
Assistant United States Attorneys

9 Attorneys for Plaintiff
UNITED STATES OF AMERICA

GLOSSARY

Pursuant to the Court's Criminal Standing Order, the following proper names and terms may be used at trial.

Witness/ Party/ Counsel Names

1. Rahul Hari
2. Neil Thakor
3. Shannon Coit
4. Ryan Shelley
5. Maksim Zaitsev
6. Kensiia (Ksuisha) Popova (if applicable)
7. Ivan Robles
8. Farris Hisle
9. Thomas Smith
10. Jose Valenzuela (if applicable)
11. Daniel Harrison
12. Steven Soohwan Shin

Department and Entity Names

13. Department of Homeland Security ("DHS")
14. U.S. Immigration and Customs Enforcement ("ICE")
15. Enforcement and Removal Operations ("ERO")
16. The Federal Protective Service ("FPS")

Case-specific Terms

17. Phalanx
18. Gustilo-Anderson
19. Tenosynovitis
20. Septic arthritis